

POLREP #2 (REVISED - FORMALLY NO. 3)

CYCLE SYSTEMS LEAD SITE

2580 BROADWAY STREET SW

CITY OF ROANOKE, VIRGINIA

ATTN: DENNIS CARNEY, KAREN MELVIN, ERD/OERR

I. SITUATION (1200 HRS, WEDNESDAY, JULY 13, 1994)

- A. ANALYTICAL RESULTS FROM SAMPLES COLLECTED DURING THE SITE ASSESSMENT FEBRUARY 15-17, 1994 INDICATED ELEVATED LEVELS (4000-5000 PPM) OF LEAD IN ON-SITE SOILS.
- B. ADDITIONAL INFORMATION IS NEEDED WITH RESPECT TO SITE OWNERSHIP AND PRP IDENTIFICATION.
- C. PERSONNEL ON SITE: EPA-2, CYCLE SYSTEMS-3

II. ACTIONS TAKEN

- A. OSC DODD AND CIVIL INVESTIGATOR (CI) RICHARDSON MOBED TO SITE TO CONDUCT RECORDS REVIEW, MEET WITH COMPANY OFFICIALS AND TO VIEW SITE.
- B. OSC AND CI REVIEWED TAX MAPS AND PROPERTY DEEDS TO DETERMINE CURRENT AND FORMER OWNERSHIP. CYCLE SYSTEMS INC. IS THE CURRENT OWNER OF THE PROPERTY WHERE THE SAMPLES WERE COLLECTED. THE PROPERTY WAS PURCHASED BY CYCLE SYSTEMS IN 1988.
- C. OSC AND CI MET WITH COMPANY OFFICIALS AND PRESENTED COPIES OF THE SAMPLE RESULTS AND A MAP OF SAMPLE LOCATIONS. OSC AND CI INFORMED CYCLE SYSTEMS OF THEIR POTENTIAL LIABILITY UNDER CERCLA.
- D. CYCLE SYSTEM REPRESENTATIVES INDICATED THAT THE COMPANY HAD PERFORMED A REMOVAL OF LEAD CONTAMINATED SOILS AT THE SITE PRIOR TO COMPLETION OF THE PURCHASE OF THE PROPERTY IN MARCH 1988. THE SOURCE OF THE LEAD IN THE SOIL ALLEGEDLY WAS DUE TO LEAD BASED PAINTING OPERATIONS CONDUCTED BY THE PREVIOUS AND NOW DEFUNCT PROPERTY OWNER, ROANOKE IRON AND BRIDGE.
- E. CYCLE SYSTEM REPRESENTATIVES INDICATED A WILLINGNESS TO NEGOTIATE A CONSENT ORDER FOR REMOVAL ACTIONS AT THE SITE.
- F. ACCESS TO THE SITE WAS DENIED.

III. FUTURE PLANS

- A. OSC TO SEND A GENERAL NOTICE AND CERCLA 104(E) LETTER TO CYCLE SYSTEMS TO GATHER ADDITIONAL INFORMATION CONCERNING THE SITE AND PRP.

- B. OSC TO DRAFT AND ASSIST IN NEGOTIATION OF A CONSENT ORDER TO CONDUCT EXTENT OF CONTAMINATION STUDY AND EXCAVATION AND DISPOSAL OF LEAD CONTAMINATED SOIL AT THE SITE.
- C. OSC TO COORDINATE SITE ACTIVITIES WITH STATE AND LOCAL OFFICIALS.

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JEFF DODD, OSC  
US EPA REGION III  
WHEELING, WV